JOHN ASHCROFT Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

ST. LOUIS REGIONAL OFFICE 10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017 314-822-0101

Fax No. 314-822-0943

Joseph Haake
McDonnell Aircraft
Mail Code 0343530
P.O. Box 516
St. Louis, MO 63166-0516

L.O.W. #91-SL.040

Division of Energy

Division of Environmental Quality Division of Geology and Land Survey Division of Management Services

Division of Parks, Recreation,

and Historic Preservation

Dear Mr. Haake:

(314) 232-3319

June 26, 1991

Enclosed, please find a report of a hazardous waste management inspection conducted June 19, 1991 by Mr. Richard Barnes of my staff on McDonnell Aircraft, Frost Avenue, St. Louis, Missouri.

Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection, and outlines steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than July 29, 1991. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Barnes. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact the St. Louis Regional Office at (314) 822-0101.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck

Regional Administrator

RSPE/RAB/sh

Enclosure

c: Waste Management Program





RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

McDonnell Aircraft (Frost Avenue)
Mail Code 0343530
P.O. Box 516
St. Louis, MO 63166-0516
(314) 232-3319

EPA ID #: MOD980968457 MO Generator ID: 004217

Participants

Department of Natural Resources

Richard A. Barnes Environmental Specialist St. Louis Regional Office

McDonnell Aircraft

Joseph Haake and Annett C. Wagner Environmental Compliance

Introduction

An inspection of McDonnell Aircraft, located at the above address, was conducted on June 19, 1991 by Mr. Richard A. Barnes of the Department of Natural Resources. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

The inspection consisted of an opening conference followed by a facility tour. Records were reviewed and a closing conference was held to explain violations observed during the inspection.

Facility Description

McDonnell Aircraft has three shifts working five days a week. The facility has approximately 360,000 square feet and has been in operation at this site for six years. The Frost Avenue hazardous waste generator identification numbers include the generation from two buildings, an office building (#248) and a tooling building (#245).

Building #248 seldom produces hazardous waste, while building #245 produces a variety of waste streams. Building #245 is the location where tooling and fixtures are produced for fabrication of sheet metal aircraft components. This fabrication tooling is machined, assembled, and painted. Parts are then "fit tested." When complete, these fixtures are removed to production areas of the McDonnell Douglas Aircraft facility.

McDonnell Aircraft, Frost Avenue, is a large quantity generator of hazardous waste and has 20 to 30 employees involved in hazardous waste management. The hazardous waste streams generated by the facility are: (See attached manifests.)

- A mixture of waste hydraulic oil (D098), waste oil from equipment maintenance (D098), waste solvent containing Tetrachloroethylene and/or Trichloroethylene (F001, F002, D039, D040) generated during air compressor and general equipment maintenance. Approximately 3,000 pounds are generated per month. This waste is transported by McDonnell Aircraft and fuel blended.
- 2. Waste ignitable solvents (F003, F005, D001, D007) generated from painting and metal cleaning operations. A small paint booth is used for hand brushing fixtures. Hand brushing of large pieces is also done in the shop. Approximately 1,900 pounds are generated per month. This waste is transported by McDonnell Aircraft and fuel blended.
- 3. Waste corrosive (D002) Alkaline cleaning solution and blue print developer solution generated in the blue print room of building #245. Approximately 300 pounds are generated per month. This waste is transported by McDonnell Aircraft to be treated for land disposal.
- 4. Waste cutting oil (D098) water emulsified cutting oil generated during machining operations in building #245. Approximately 15,000 pounds are generated per month. This waste stream is transported by Heritage to their facility in Indianapolis, Indiana, to be separated. The oil is then used in fuel blending.

Unsatisfactory Features

- 1. Hazardous waste container not labeled or marked, in violation of 10 CSR 25-5.262(2)(C)1 referencing 40 CFR 262.31 and 40 CFR 262.32 further referencing 49 CFR 172 Subpart D. The 345 gallon portable container used to remove and store cutting oil was not marked or labeled. The Missouri Hazardous Waste regulations require the containers to be labeled during the entire onsite storage period and the beginning date of accumulation is to be provided on the containers, indicating the day the waste was first placed into them. The facility must include this information on all containers of hazardous waste.
- 2. Greater than 55 gallons of hazardous waste in satellite storage, in violation of 10 CSR 25-5.262(c)3. The satellite storage area for waste corrosive in the print shop contained one full 55 gallon drum and one partial drum. Both drums had a start date of March 15, 1991. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near the point of generation. The facility must not store over 55 gallons of waste at any one satellite point.

Should you have any questions regarding this report, please contact the St. Louis Regional Office.

Prepared by:

Richard A. Barnes

Environmental Specialist St. Louis Regional Office

LARGE QUA	NTITY GENERATOR	CheckLIST	Form LOG-INSP (10-15-33)
Name of Facility: MCDONNGLL AIR	CRAFT, FrOST	Date: 6-19-9	/
Address: 8900 Frost AVE	N. Alex	Other Inspection RRTRANS_	ons Done: LDR
Phone: (314) 232-3319 MO II Facility Representative: Joseph	1.	EPA ID# MOD9809 Title: Section	
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	F. PERSONNEL TRAINING 10 OSR 15-5.161(1)	
	Documentation of hazardous waste director's qualifications or training.	
	Completed Classroom or on-the-job training. Not a war a service of	
	lob title, description, and name of person filling position	
	written record of the type and amount of training given a	
	Documentation confirming that training has been given	
	FREFAREDNESS AND PREVENTION TO CSR 25-5.262-1, AND 5.15-11/10-2.E.	
	Internal communication or elers system.	
	Sevice in the hazardous waste operation area capable of summoning amergency assistance.	
	Fire control, spill control, and decontamination equipment available.	
	Adequate vater supply for fire control equipment	
	Adequate and proper safety equipment available.	
	Adequate aisle space	
	Arrangements with local emergency agencies.	
	H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)	
	Contingency Plan	
	Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste	
	Describe formal arrangements with emergency agencies	
	Name, addresses, and phone numbers (home & office) of emergency coordinators	
	Emergency equipment including its description and location	
	Evacuation plan if applicable	
	I. WASTE OIL 10 CSR 25-11.010	
	Written waste oil contract maintained	
	Waste oil properly stored and transported	
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inspector S	ignature & Title: / What A / Wines	
	Office: SLRO.	
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IN COMPLIANCE

IN VIOLATION OR ABSENT



MISSOURI DEPARTMENT OF NATURAL RESCURCES
P.O. BOX 176 (314) 751-3176
JEFFERSON CITY, MISSOURI 66102

PART	11
CE CE ON	-

GENERATOR'S HAZARDOUS WASTE REPORT SUMMARY SHEET

NOTE > PLEASE READ INSTRUC	TIONS	AND EIT	HER PRINT	OR TYP							
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T04: Resource recovery



MISSOURI DEPARTMENT OF NATURAL RESCURCES P.G. BOX 176 (314) 751-3176

PART II CFFICE USE ONLY

JEFFERSON CITY, MISSOURI 65102

GENERATOR'S HAZARDOUS WASTE REPORT SUMMARY SHEET

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INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET: THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED

Please print or type: (Form designed for use on eithe (12-pitch) typewriter.)

MISSOURI DEPARTMENT OF NATURAL RESOURCES:

Division of Environmental Quality.

Waste Management Program
P.O. Box 176 Jefferson City, Missouri 85162

314-751-3176

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCE 314-634-2435

3600

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Form Approved. OMB No. 2050-0039, Expires 9-30-91

SHIPMENTS. HAZARDOUS WASTE MANIFEST

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THE TRUCTIONS FOR THE COMPLETION OF THIS COMPARE ON A
SEPARATE SHEET.
THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTS.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

MISSOURI DEPARTMENT OF NATURAL REJURCES Division of Environmental Quality: Waste Management Program P.O. Box 176 Jefferson City, Missouri 66102

314-751-3176

EMERGENCY RESPON: U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT. OF RATURAL RESOR

Form Approved, OMB No. 2050-0039, Expires 9-30-91

HAZARDOUS WASTE MANIFEST

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3. Generator's Name and Mailing Address McDonnell Douglas Corporation - St			
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9. Designated Facility Name and Site Address	10. US EPA ID Number		
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16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of			
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and that I have selected the practicable method of treatment, storage, OR, if I am a small quantity generator I have made a good faith effort to m			
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INSTRUCTION FOR THE COM-PLETION OF AS FORM ARE ON A SEPARATE SMEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
Box 176 Jefferson City, Missouri-85108 Waste Management Program
P.O. Box 176 Jefferson City, Missouri-65102 314-751-3178

HAZARDOUS WASTE MANIFEST (MITTER)

EMERGENCY RESPON U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-8000 DEPT OF NATURAL RESOURCE

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P.O. Box 170 Johnson Chy, IT wintes the 400 St4-751-3170

Total	Unit WV/Vol.
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Special Handling Instructions and Additional Information If unable to deliver to designated TSD facility, return to generator. Emergency Contact: (314) 232-2285 3ENERATOR'S CERTIFICATION: I hereby declare that the consignment are fully and accurately described above by proper phipping name and stated and are in all respects in proper condition for the philosophy registed was published and are in all respects in proper condition for the philosophy registed was published and are in all respects in proper condition for the philosophy registed was published and are in all respects in proper condition for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions for the philosophy registed was published and are in all respects in proper conditions are the philosophy registed was published and are in all respects in proper conditions are the proper conditio	and are classified, packed, marks
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INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARAT SHEET. THIS DOT UMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

EPA Form 8700-22 (Rev. 9-88) MONR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 178 Jefferson City, Missouri 65102

1-800-424-9300 DEPT, OF NATURAL RESOUR 314-634-2438

EMERGENCY RESPONS

U.S. COAST GHARD

CHEM TREC

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039, Expires 9-30-91 UNIFORM HAZAROOUS 1. Generator's US EPAID No. Manifest 2 Page 1 Information in the shaded areas DOOF 5 WASTE MANIFEST 400980353457 of I is required by State law ... 3. Generator's Name and Mailing Address McDonnell Douglas Corporation - St. Louis P.O. dox 516, AC 0343530, St. Louis, Missouri 53166 4. Generator's Phone (314) 232-3319 5. Transporter 1 Company Name . 6. US EPA ID Number Heritage Transport, Inc. UND 0 3 6 4 8 4 1 1 14 7. Transporter 2 Company Name. 8. US EPA ID Number None 9. Designated Facility Name and Site Address 10. US EPA ID Number Heritage Environmental Services, Inc. 7901 West Morris Street 11.N.D.D.3.3.2.1.9.0.1 Indianapolis, Indiana 40231 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number). Total Unit Quantity Wt/Vol "Emulsified Cutting Oil (not regulated) DOT-E-9166 0,01 N E A C 15. Special Handling Instructions and Additional Information HES. 282721 "If unable to deliver to designated TSD facility, return to X generator." Emergency Contact: 314-232-2285 Missouri Document @@XM@XXX 004217-0075 16. GENERATOR'S CERTIFICATION: I bereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, paint labeled, and are in all respects in emper, condition for managed by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste-generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposed currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small-quantity generator, i have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford. Printed/Typed Name 17. Transporter 1. Acknowledgement of Receipt of Materials Date Day Reinted/Typed Name Month 010 18. Transporter 2 Acknowledgement of Receipt of Materials Date Printed/Typed Name Day Signature 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Month Day Printed/Typed Name 132619V

INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSI
US COAST GLARD
1-800-24-8802
CHEM TREC
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program
P.O. Box 176 Jeiferson City, Missouri 65102
314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE
J S COAST GUARD
1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT OF NATURAL RESOURCES 314-634-2436

MISSOURI DNR FINAL COPY — PART 1 THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

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Printed Typed Name An Thory P. Nibe Say Signature Signat	Ĺ	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by the	his manifest except as noted in	Item 19.						
An thory P. Nibe say Signature Signa	T) -						
PA FORM 8700-22 (Rev. 9-88), MCNR, HWG 10. PREVIOUS EDITIONS ARE ORSOLETE		Printed/Typed Name	Signature	A	7 /	2	ذ		Month	7 41 91
	EP.	FORM \$700-22 (Rev Q.88) MONR, HAVE 10 PREVIOUS EDITIONS OF ORCOLETE	Cycl. C	77	1		/		7 (



PRINT NAME

Robert H. Kaatman

MISSOURI DEPARTMENT OF NATURAL RESCURCES WASTE MANAGEMENT PROGRAM P.O. BOX 176 (314) 751-3176

JEFFERSON CITY, MISSOURI 65102

PARTI OFFICE USE ONLY

GENERATOR'S HAZARDOUS WAS	STE REPORT SUMMARY SHEET		
NOTE > PLEASE READ INSTRUCTIONS AND EIT			
Regardless of whether any off-site shipment occurred and transmit this form to the Department of Natural Res	, as a registered generator of hazardous sources.	waste, you	must complete, sign
SECTION A REPORT IDENTIFICATION			
1. TYPE OF REPORT (CHECK ONE)	2. FOR THE PERIOD ENDING ICHECK ONE & FILL IN YE	The second second	
☑ QUARTERLY ☐ ANNUAL (NON-GENERATE	01		OF3
(IF ANNUAL CHECKED, PLACE X IN 6-30 BOX)	☑ 3-31- 91(YEAR) ☐ 6-30(YEAR		
SECTION B GENERATOR IDENTIFICATION 4 GENERATOR'S NAME		5 GENERATO	R'S USEPA I.D. NUMBER
4. GENERAL ON STRANG		3 GENERATOR	N S OSEFA I.D. NUMBER
McDonnell Douglas Corporation		M · O · D · 9	-8-0-9-6-8-4-5
6. GENERATOR CONTACT PERSON (NAME)	TELEPHONE NUMBER	7. GENERATOR	R'S MISSOURI I.D. NUMBER
Robert H. Kaatman	314-232-3319	0	.0.4.2.1.7
8. MAILING ADDRESS CITY		STATE	ZIP CODE
P.O. Box 516, MC 0343530 S	t. Louis	мо	63166
9. PLANT ADDRESS CITY		STATE	ZIP CODE
8900 Frost Avenue	St. Louis	MO	63134
10. NAME OF PARENT FIRM			OFFICE USE ONLY
McDonnell Douglas Corporation			
SECTION C - STATUS OF WASTE GENERATED (CHE	CK ONE!		
11.	13.		
Y completed nazaroods waste manifests, sign			TY GENERATED BUT NO QUARTER Sign certification ar
Continued on and transmit to the department.	transmit to) the department.	(Do not complete Part 2)
SECTION D - COMMENTS 14.			
19.			
•			
	•		
SECTION E - CERTIFICATION STATEMENT			
I certify under penalty of law that I have personally exar	nined and am familiar with the information	submitted i	n this and all attach
documents and that based on my inquiry of those in			
that the submitted information is true, accurate, and co	omplete. I am aware that there are signific		
information, including the possibility of fine and impriso	nment.		

SIGNATURE

DATE

9 May 9.1